

Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO AMADOR-GARCIA,

Defendant.

NO. CR21-174-JCC

GOVERNMENT'S SENTENCING
MEMORANDUM

Mario AMADOR-GARCIA helped his sister, Iris AMADOR-GARCIA, and her boyfriend, Jose MALDONADO-RAMIREZ, distribute incredibly large amounts of methamphetamine, heroin, and fentanyl pills. This Drug Trafficking Organization (DTO) was well-organized, well-sourced, and, unlike most of the DTOs prosecuted in this District, this DTO's drugs reached every corner of the continental United States. In addition to helping the DTO redistribute these drugs, Mario AMADOR-GARCIA also helped supply it with these drugs, including 80,000 fentanyl pills that were seized at takedown. He acquired those pills believing they would be used to acquire eight assault-style semi-automatic rifles that would be transported to Mexico and used by family members in a drug-fueled conflict there. As a result of his conduct, Mario AMADOR-GARCIA pleaded guilty to Conspiracy to Distribute Controlled Substances. Due to the magnitude of the DTO's drug trafficking activity, and Mario AMADOR-GARCIA's possession of handguns

1 and role in trying to acquire the semi-automatic rifles, the United States respectfully
 2 requests the Court sentence him to 72 months' imprisonment and impose a four-year term
 3 of supervised release.

4 I. SUMMARY OF THE INVESTIGATION

5 In February 2020, DEA agents identified MALDONADO-RAMIREZ¹ as a large
 6 methamphetamine distributor operating in Western Washington, working in conjunction
 7 with his girlfriend, Iris AMADOR-GARCIA. Over the next 18 months, through controlled
 8 purchases, physical and electronic surveillance, travel records, and a variety of other
 9 investigative techniques, agents were able to determine that MALDONADO-RAMIREZ
 10 and Iris AMADOR-GARCIA not only had an extensive drug trafficking operation in
 11 Western Washington, but they also appeared to be conducting similar activities in the
 12 Northeast (Massachusetts and New York), the Midwest (Illinois and Ohio) and the South
 13 (Florida, Arkansas, Tennessee, and Virginia). During recorded conversations with
 14 cooperating sources, MALDONADO-RAMIREZ spoke openly about supplying large
 15 amounts of methamphetamine, heroin, and fentanyl pills to redistributors in Washington,
 16 as well as others in Tennessee and New York, and later of his plan to ultimately distribute
 17 100 pounds of methamphetamine per month in Western Washington.

18 Using confidential sources, agents conducted 12 controlled purchases from
 19 MALDONADO-RAMIREZ, Iris AMADOR-GARCIA, and their criminal associates, both
 20 before and after agents began intercepting the DTO's phones. Each of the controlled buys
 21 included in the chart below was arranged through MALDONADO-RAMIREZ and the
 22 drugs were delivered by him, Iris AMADOR-GARCIA, or a close associate.² In total,
 23

24
 25 ¹ Individuals whose names are capitalized have been charged in this case; individuals whose names
 are not capitalized are unindicted co-conspirators.

26 ² Drug amounts in **bold** and followed by "g" refer to drugs that were subsequently tested and
 27 weighed by the DEA Lab.

agents purchased approximately 13 pounds of methamphetamine and close to 17,000 pills containing fentanyl.

CONTROLLED BUYS				
#	DATE	DRUG AMOUNT ORDERED / DELIVERD	CS USED	PARTICIPANTS
1	2/16/20	1 lb Meth / 437.7 g (100%)	CS1	MALDONADO-RAMIREZ
2	3/2/20	4 lbs Meth / 1,740.5 g (99%)	CS1	MALDONADO-RAMIREZ & Iris AMADOR-GARCIA
3	6/30/20	500 Pills / 43.7 g	CS1	MALDONADO-RAMIREZ & Alysha Jones
4	8/5/20	500 Pills / 58.4 g	CS1	MALDONADO-RAMIREZ & Malaquais Lopez-Chavez
5	11/24/20	1 lb Meth / 458.9 g (99%)	CS1	MALDONADO-RAMIREZ & LOPEZ-MENDEZ
6	3/10/21	1 lb Meth / 421.5 g (95%)	CS4	MALDONADO-RAMIREZ & LOPEZ-MENDEZ
7	4/22/21	2 lbs Meth / 840.1 g (94%)	CS4	MALDONADO-RAMIREZ & BERNAL
8	4/30/21	1,000 Pills / 111.3 g	CS4	MALDONADO-RAMIREZ
9	5/28/21	5,000 Pills / 556.4 g	CS4	MALDONADO-RAMIREZ & BERNAL
10	6/11/21	2 lbs Meth / 878.7 g (97%)	CS4	MALDONADO-RAMIREZ & BERNAL
11	7/1/21	2 lbs Meth / 866.6 g (96%)	CS4, CS5	MALDONADO-RAMIREZ & BERNAL
12	9/2/21	10,000 Pills / 1,115.6 g	CS4, CS5	MALDONADO-RAMIREZ

In addition to the controlled buys, agents seized large quantities of drugs on four occasions. Three of the seizures were the result of a traffic stop and subsequent search of an interstate courier's vehicle. During the first seizure on May 16, 2020, agents in Washington recovered over nine pounds of methamphetamine (**4,179.8 grams** – 95% pure) from a truck occupied by MALDONADO-RAMIREZ and driven by interstate courier Fernando Alcides LOPEZ-MENDEZ. Close to a year later, on April 2, 2021, agents in California seized approximately 30 pounds of methamphetamine (**13,300 grams** – 95% pure) from a rental car driven by LOPEZ-MENDEZ. Most recently, on September 28,

2021, agents in Washington seized more than 57 pounds of methamphetamine (**25,950 grams** – 96% pure) and close to 20,000 pills containing fentanyl (**2,201.0 grams** of fentanyl) from a rental car driven by interstate courier Justino CRUZ-VICTORIO. *See* photographs of the seizure on September 28, 2021, below.

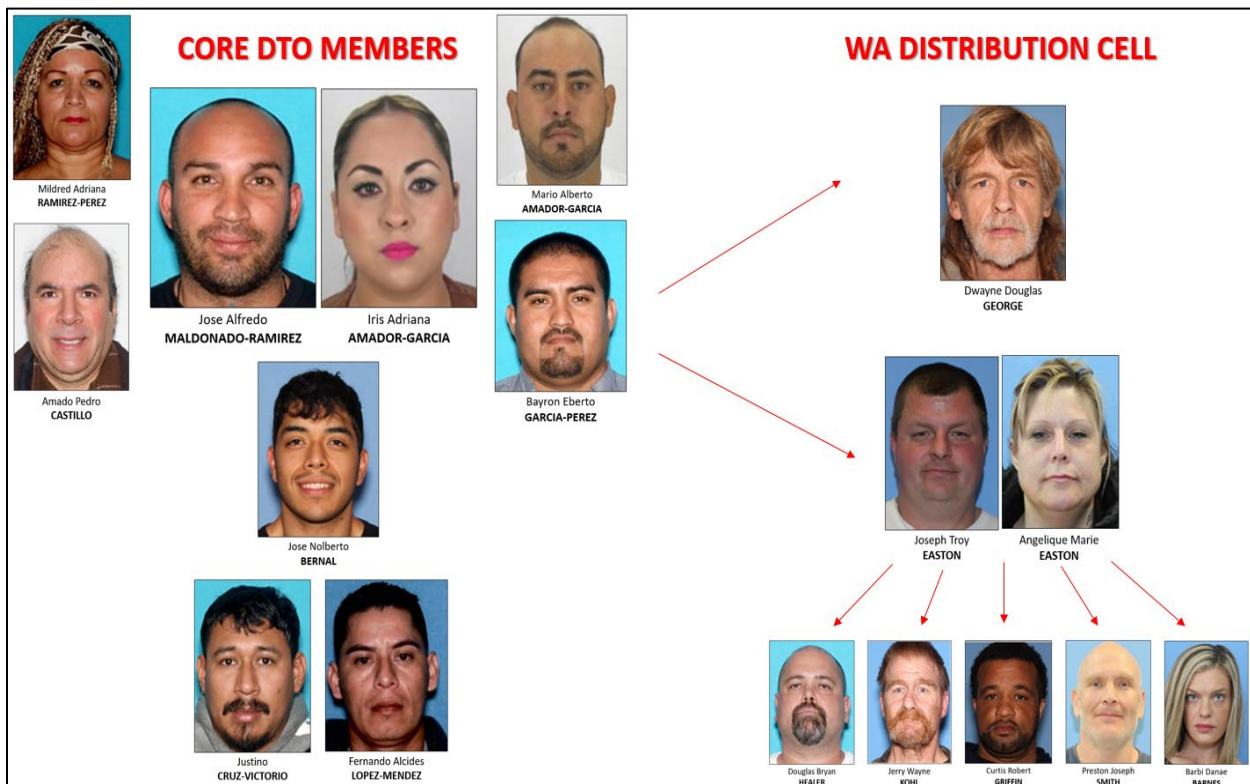


In addition to those three seizures from the interstate couriers, on August 17, 2021, agents in California also intercepted more than 19 pounds of methamphetamine (**8,692.0 grams** – 96% pure) that Iris AMADOR-GARCIA, MALDONADO-RAMIREZ, his mother (Mildred Adriana RAMIREZ-PEREZ) and her brother-in-law (Amado Pedro CASTILLO) attempted to send to a buyer in Fiji. Between the controlled purchases and the seizures described above, agents seized approximately 128 pounds of methamphetamine and 37,000 fentanyl pills.

Through the interception of MALDONADO-RAMIREZ's phones, agents quickly discovered that Iris AMADOR-GARCIA was an equal partner in their drug trafficking business and that the majority of drugs distributed by the DTO were secured by Iris

AMADOR-GARCIA. Intercepted communications and other evidence also confirmed that they were assisted by MALDONADO-RAMIREZ's mother in Mexico (RAMIREZ-PEREZ), his uncle in New York (CASTILLO) and his friend in Washington (Jose Nolberto BERNAL), as well as Iris AMADOR-GARCIA's brother (Mario Alberto AMADOR-GARCIA) and her other boyfriend (Bayron Eberto GARCIA-PEREZ), both of whom resided with her in California.

Through intercepted calls and surveillance, agents identified two large, local redistributors in Western Washington, Joseph Troy EASTON and Dwayne Douglas GEORGE, who were responsible for distributing the drugs transported from California. Interceptions over Joseph EASTON's phones, revealed that his wife (Angelique EASTON) helped him distribute drugs to an assortment of local redistributors (such as Jerry Wayne KOHL, Douglas Bryan HEALER, Curtis Robert GRIFFIN, Preston Joseph SMITH, and Barbi Danae BARNES) who were obtaining drugs in multiple pounds and/or kilograms, not ounces. *See* organizational chart below.



1 In addition to the incredible amounts of drugs being pumped into our communities
2 across the United States, there were other concerning aspects to this DTO that surfaced
3 towards the end of the investigation. First, during the last controlled buy on September 2,
4 2021, MALDONADO-RAMIREZ asked CS4 and CS5 to help him acquire some firearms
5 (referred to as “toys”) so he (MALDONADO-RAMIREZ) could send them to family
6 members of Iris AMADOR-GARCIA and her brother Mario AMADOR-GARCIA, who
7 were fighting others in Tijuana, Mexico. *See Exhibit A* (DEA reports related to this
8 firearms deal). MALDONADO-RAMIREZ explained that he had \$30,000 available to pay
9 for the firearms but preferred to pay for the firearms with drugs. After subsequent
10 communications with MALDONADO-RAMIREZ, during which he made it clear that they
11 (MALDONADO-RAMIREZ and family) were looking for larger guns, not handguns, CS4
12 sent two photographs of eight high-powered semiautomatic rifles to MALDONADO-
13 RAMIREZ at the agents’ direction. *See* photographs below.



23 MALDONADO-RAMIREZ and CS4 continued to discuss this “deal” throughout
24 September and October 2021 and eventually agreed that MALDONADO-RAMIREZ
25 would provide 40 to 60 pounds of methamphetamine and 75,000 to 80,000 fentanyl pills
26 in exchange for the eight semiautomatic rifles and cash. During this time, MALDONADO-
27 RAMIREZ communicated with Mario AMADOR-GARCIA about the firearms deal, and

1 it appeared that Mario AMADOR-GARCIA was communicating with his family members
2 in Mexico regarding the firearms being offered and was responsible for securing the
3 fentanyl pills for this deal. *See Exhibit B* (Summary of an intercepted call, Session 975).

4 Even more concerning, however, was the DTO's brazen threat to harm a local
5 officer. On October 4, 2021, just six days after the 57 pounds of methamphetamine and
6 20,000 fentanyl pills were seized from CRUZ-VICTORIO in Washington, agents
7 intercepted a call between Iris AMADOR-GARCIA and MALDONADO-RAMIREZ
8 discussing the local officer who was responsible for the seizure. During the call, Iris
9 AMADOR-GARCIA told MALDONADO-RAMIREZ that they had identified the officer
10 responsible for the seizure, knew where he lived, and needed a "toy" (firearm).
11 MALDONADO-RAMIREZ said he had the toys – four of them – and added they were
12 "short ones" (handguns). Iris AMADOR-GARCIA said she needed ammunition and
13 wanted him (MALDONADO-RAMIREZ) to clean them (the guns). MALDONADO-
14 RAMIREZ asked, "Who is going to help you, your cousin?" Iris AMADOR-GARCIA
15 replied, "Uh-huh." Following the call, agents alerted the Centralia Police Department and
16 the officer. He and his family relocated to a hotel and were placed into protective custody.

17 Due to that discussion, the government decided to accelerate the arrests of
18 MALDONADO-RAMIREZ, Iris AMADOR-GARCIA, Mario AMADOR-GARCIA, and
19 their closest associates, who agents believed would flee if not arrested at the same time.
20 Accordingly, the government split its charges into two indictments returned on October 20,
21 2021, corresponding with two separately planned coordinated arrest operations (the
22 *Maldonado-Ramirez* indictment and the *George* indictment, corresponding with the "Core
23 DTO" and "WA Distribution Cell" portions of the above chart, respectively).

24 On October 28, 2021, agents executed search warrants in Washington, California,
25 and New York, and arrested seven of the eight defendants indicted in the *Maldonado-*
26 *Ramirez* case (MALDONADO-RAMIREZ's mother, Mildred RAMIREZ-PEREZ,
27

1 remains a fugitive), along with one other individual, GARCIA-PEREZ, who was
2 subsequently charged by complaint. During a search of the California residence shared by
3 Iris AMADOR-GARCIA, GARCIA-PEREZ, and Mario AMADOR-GARCIA, agents
4 recovered 80,000 fentanyl pills (**8,657.0 grams**) and more than a kilogram of fentanyl
5 powder (**1,002.7 grams**), as well as \$91,000, and two handguns. The 80,000 pills, which
6 had been secured by Mario AMADOR-GARCIA for the purpose of acquiring the eight
7 semi-automatic rifles, were recovered from a backpack in the garage. Based on intercepted
8 calls, toll records, and tracking information from redistributor GEORGE's phone, agents
9 believe GEORGE arrived in California that day to transport those pills and a large amount
10 of methamphetamine stored at an unknown location to Washington for the firearms deal
11 and for general distribution to the DTO's redistributors in Washington.

12 During the search of MALDONADO-RAMIREZ's home in California, as well as
13 his apartment and storage unit in Kent, Washington, agents recovered a total of three
14 handguns and one semiautomatic assault rifle, a small amount of cocaine, two drug ledgers,
15 digital scales, and drug packaging materials. Agents also recovered another four firearms
16 (two handguns and two semiautomatic rifles), approximately 1,000 fentanyl pills, more
17 than \$2,100, two drug ledgers, and drug packaging materials from BERNAL's neighboring
18 apartment in Kent. Finally, a drug packaging station was discovered at CRUZ-
19 VICTORIO's California residence.

20 On November 2, 2021, agents executed additional warrants in Washington and
21 Arkansas and arrested six of the eight defendants in the *George* indictment, along with one
22 other individual (Robert Eugene MEYER), who was subsequently charged by complaint
23 after more than a kilogram of methamphetamine, four firearms, three improvised explosive
24 devices, and more than \$20,000 in cash drug proceeds were recovered from his residence.
25 SMITH and his former girlfriend, Barbi BARNES, were not located that day, but were
26 arrested separately in the weeks that followed.

1 When agents attempted to arrest Douglas HEALER and execute warrants to search
2 his house and vehicle, HEALER engaged in an armed standoff with law enforcement, firing
3 a shot inside his home, and refusing to surrender for many hours. When he was eventually
4 taken into custody, agents recovered the semi-automatic assault rifle that HEALER had
5 fired during the standoff, as well as 55 additional firearms, including a handgun equipped
6 with a fake suppressor from his bedroom and a combination of 54 handguns, rifles,
7 shotguns, and assault rifles from two separate gun safes. Agents also recovered body armor,
8 a large assortment of ammunition, and more than 100 grams of methamphetamine and five
9 kilograms of marijuana from HEALER's home.

10 The arrests and searches of the other redistributors' homes (GEORGE, the
11 EASTONS, GRIFFIN, and KOHL) resulted in the seizure of additional quantities of
12 narcotics and a few additional firearms – a handgun and shotgun were recovered from
13 GRIFFIN's residence, and one handgun was recovered from the EASTONS' residence.
14 HEALER, GRIFFIN, and both EASTONS were prohibited from possessing firearms due
15 to their lengthy criminal pasts.

16 A detailed description of Mario AMADOR-GARCIA's role in the conspiracy is
17 provided in Section V.B, below.

18 **II. MARIO AMADOR-GARCIA'S GUILTY PLEA**

19 On March 31, 2023, Mario AMADOR-GARCIA pleaded guilty to a lesser-included
20 drug conspiracy offense, in violation of Title 21, United States Code, Sections 841(a)(1),
21 (b)(1)(B) and 846. Dkt. 517. Included with his plea was a detailed statement of facts that
22 described his criminal conduct. *Id.* at ¶ 8. In the plea agreement, the United States agreed
23 to recommend a sentence of no greater than 72 months. *Id.* at ¶ 11.

24 //

25 //

26 //

III. STATUTORY PENALTIES

Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and 846, is punishable by a term of imprisonment of up to 40 years with mandatory minimum term of five years, a fine of up to \$5,000,000, a mandatory period of supervision following release from prison of at least four years, and a mandatory special assessment of \$100.

IV. SENTENCING GUIDELINES

A. Offense Level

The parties and United States Probation agree that Mario AMADOR-GARCIA's total offense level under the Sentencing Guidelines is 37, as calculated below.

Base Offense Level	34	Amount of drugs -- USSG § 2D1.1(c)(3)
Specific Offense Characteristics	+2	Possession of two firearms -- USSG § 2D1.1(b)(1)
	+4	Knowing misrepresentation of a substance containing fentanyl -- USSG § 2D1.1(b)(13)
Acceptance of Responsibility	- 3	Acceptance and timely plea -- USSG § 3E1.1(a) and (b)
Total Offense Level:	<u>37</u>	

PSR ¶¶ 34-44; *see also* Dkt. 517 at 9.

B. Criminal History Category

Mario AMADOR-GARCIA does not have any prior criminal history. PSR ¶¶ 45-46. As a result, he falls into Criminal History Category I. PSR ¶ 47.

C. Guidelines Range

Based on a total offense level of 37 and Criminal History Category I, the parties agree that Mario AMADOR-GARCIA's Guidelines range is 210 to 262 months. PSR ¶ 79.

V. GOVERNMENT'S SENTENCING RECOMMENDATION

The United States respectfully requests that the Court sentence Mario AMADOR-GARCIA to 72 months' imprisonment, followed by a four-year term of supervised release. The United States believes that a 72-month sentence is appropriate in light of "the nature and circumstances of the offense," and the need for the sentence "to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense," and "to protect the public from further crimes of the defendant." 18 U.S.C. §§ 3553(a)(1), (a)(2)(A), and (a)(2)(C). A review of the pertinent Section 3553(a) sentencing factors, below, supports the recommended sentence.

A. Mario AMADOR-GARCIA's History and Characteristics

Based on his self-report,³ Mario AMADOR-GARCIA was born in Mexico and has three sisters, including co-defendant Iris AMADOR-GARCIA. PSR ¶ 52. Outside of Iris AMADOR-GARCIA, everyone in his immediate family still resides in Mexico. *Id.* He graduated high school in 2008, met his first wife shortly thereafter, and they had two children (ages 6 and 15). PSR ¶ 53. They divorced in 2018, and in 2021 he married a childhood friend who had one child of her own (age 11). PSR ¶¶ 55-56. Mario AMADOR-GARCIA has worked a variety of jobs and in 2012 began a trucking company with his father. PSR ¶¶ 54 and 70. By late 2019/early 2020, he entered the United States to take part in his family's drug trafficking activities. PSR ¶ 56.

B. MARIO AMADOR-GARCIA's Role in the Offense

The nation-wide reach of this DTO sets it apart from the majority of organizations prosecuted in this courthouse. This DTO distributed dangerous drugs to all corners of the United States, including the northeast (New York and Massachusetts), the southeast (Florida, Tennessee, Virginia, and Arkansas), and the Midwest (Illinois and Ohio). Many

³ USPO Lisimba Jackson was unable to verify the background information with any third party. PSR ¶ 51.

of drugs being sold, both in Washington and elsewhere, were coming from Mario and Iris AMADOR-GARCIA's extended family in Mexico.

Mario AMADOR-GARCIA was originally identified as a member of the DTO in late 2019 and early 2020, though his exact role was initially unclear. CS1 had observed him accompany his sister, Iris AMADOR-GARCIA, and GARCIA-PEREZ to Washington on several occasions when they would distribute drugs and collect money, but CS1 never specifically dealt with Mario AMADOR-GARCIA. Investigators first observed him during a trip to Washington in January 2020. *See* photographs below. Mario AMADOR-GARCIA admitted that he helped distribute drugs and collect cash drug proceeds during these early trips to Washington.



Hampton Inn Seattle/Southcenter 7200 South 156th Street • Tukwila, WA 98188 Phone (425) 228-5800 • Fax (425) 228-6812	
Garcia, Bayron 2752 Cogswell Road El Monte, CA 91732 United States of America	name address room number: arrival date: departure date: adult/child: room rate: Rate Plan: HH # AL: Car:
Confirmation Number: 93777337 Auto Make: <u>Kam</u> License#: <u>PAGE 1</u> 1/21/2020	121 252/SXBL 1/21/2020 1/25/2020 1/0 130.34 USD 115.00 1212717187 SILVER
If the debit/credit card you are using for check-in is attached to a bank or checking account, a hold will be placed on the account for the full anticipated dollar amount to be owed to the hotel, including estimated incidentals, through your date of check-out and such funds will not be released for 72 business hours from the date of check-out or longer at the discretion of your financial institution.	
Rates subject to applicable sales, occupancy, or other taxes. Please do not leave any money or items of value unattended in your room. A safety deposit box is available for you in the lobby. I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or association fails to pay for any part or the full amount of these charges. A fee of up to 250 USD will be assessed for smoking in a non-smoking room. Please ask the Front Desk for locations of designated outdoor smoking areas. In the event of an emergency, if someone in my party require special evacuation assistance due to a physical disability, please indicate you by checking here: <input type="checkbox"/>	
signature: <u>Bayron</u>	
date	reference
	description
	amount

Top Left: Mario and Iris AMADOR-GARCIA in the Hampton Inn parking lot on January 25, 2020
 Top Right: Mario and Iris AMADOR-GARCIA getting into a white truck driven by GARCIA-PEREZ
 Bottom: GARCIA-PEREZ's receipt for their stay at the Hampton Inn in Tukwila in January 2020

1 Later, in 2020 and 2021, Mario AMADOR-GARCIA helped facilitate the DTO's
 2 operations in Tennessee, Arkansas, and Virginia. During this time, he regularly traveled to
 3 the southeast to deliver drugs and collect cash drug proceeds. *See* photographs below of
 4 Mario AMADOR-GARCIA depositing cash drug proceeds into Wells Fargo ATMs in
 5 Tennessee and Virginia between April 9, 2021 and April 16, 2021.



19 Later, in August 2021, after agents began intercepting the DTO's phones, agents
 20 discovered that Mario AMADOR-GARCIA also helped supply the DTO with drugs. For
 21 example, during a pair of conversations on August 4, 2021, with both his sister and
 22 MALDONADO-RAMIREZ, Mario AMADOR-GARCIA discussed providing them with
 23 heroin mixed with fentanyl and assured them that it was stronger than what they had
 24 received in the past. MALDONADO-RAMIREZ then explained what his buyers were
 25 looking for, the quality of the heroin that would be provided, and the need to provide
 26 samples of the heroin mixed with fentanyl that he (Mario AMADOR-GARCIA) was going
 27

1 to be supplying. In later calls on September 23, 2021, and September 28, 2021, Mario
2 AMADOR-GARCIA and MALDONADO-RAMIREZ also discussed the inconsistency of
3 the fentanyl pills Mario AMADOR-GARCIA had been providing and the complaints
4 MALDONADO-RAMIREZ was receiving from the DTO redistributors in Washington.

5 In addition, as detailed earlier, Mario AMADOR-GARCIA and MALDONADO-
6 RAMIREZ discussed the drugs-for-guns deal that MALDONADO-RAMIREZ had been
7 arranging with two Confidential Sources (CSs) working with law enforcement during an
8 intercepted call on September 23, 2021. *See Exhibits A and B.* Their plan was to provide
9 the CSs with 80,000 fentanyl pills and 40 to 60 pounds of methamphetamine in exchange
10 for cash and eight semiautomatic assault rifles. Mario AMADOR-GARCIA's role was to
11 acquire the 80,000 fentanyl pills for the deal, as MALDONADO-RAMIREZ already had
12 the necessary 40 to 60 pounds of methamphetamine on hand. Once the pills were acquired
13 and smuggled into the United States, the DTO would have an interstate courier transport
14 the methamphetamine and pills from California to Washington and MALDONADO-
15 RAMIREZ would personally consummate the deal with the CSs in Washington.

16 In anticipation of the deal, MALDONADO-RAMIREZ returned to California (from
17 Washington) on October 27, 2021, and was followed a day later (October 28, 2021) by
18 GEORGE, a redistributor from Washington who began serving as the DTO's interstate
19 courier after the seizure from CRUZ-VICTORIO on September 27, 2021. That same
20 morning (October 28), prior to GEORGE's arrival, agents arrested Mario AMADOR-
21 GARCIA, his sister, and GARCIA-PEREZ in the home they shared in Southern California.
22 During a search of the home, agents recovered 80,000 fentanyl pills (**8,657.0 grams**) and
23 more than a kilogram of fentanyl powder (**1,002.7 grams**), as well as \$91,000 and two
24 handguns. The 80,000 pills, which had been secured by Mario AMADOR-GARCIA for
25 the purpose of acquiring the eight semiautomatic rifles, were recovered from a backpack
26 in the garage. *See* photographs of the residence and the pills below. In addition, agents also
27

recovered two firearms – a Colt .45 caliber handgun and a Sig Sauer .380 caliber handgun – from Mario AMADOR-GARCIA’s bedroom.



8712 Ramona Street, Bellflower, CA



C. Nature and Circumstances, and Seriousness of the Offenses

The Court knows the devastating impact that drugs like methamphetamine, heroin, and fentanyl have on the community. Drug users frequently resort to stealing – from family members, friends, and complete strangers – to feed their addiction and are responsible for a large percentage of these crimes, as well as the violent crimes, in our communities.

More importantly, the Court also knows that these drugs not only destroy the lives of those who use them, they also destroy the lives of the users’ families and friends. Those families and friends are prisoners, forced to watch the toll these drugs take on their son, their daughter, their mother, their father, their friend. While it is difficult to quantify the number of people directly and indirectly impacted by the drugs Mario AMADOR-GARCIA helped distribute nationwide, it is undeniable. These drugs undoubtedly fell into the hands of long-time addicts, first-time users, and everyone in between. Their lives, and the lives of those around them, will never be the same. And that is just the fate bestowed upon those that were fortunate enough to survive. Based on recent numbers from Public Health of Seattle and King County, there were 701 overdose deaths in King County between January 1, 2022, and October 15, 2022. *See Exhibit C* (King County Public Health Report). Of those deaths, 70% of them (~ 490 deaths) were attributable to fentanyl. *Id.* That means the fentanyl pills sold on the street, just like those supplied by Mario AMADOR-GARCIA and distributed by this DTO, are responsible for killing more than one person per

1 day in King County alone. Thus, it is not unreasonable to believe that law enforcement's
 2 seizure of 20,000 fentanyl pills in September 2021 and then another 80,000 pills in October
 3 2021 saved lives.

4 **D. Need to Promote Respect for the Law, Provide Just Punishment for the**
 5 **Offense, Afford Adequate Deterrence, and Protect the Public**

6 Mario AMADOR-GARCIA's motivation for getting involved in drug trafficking
 7 was purely financial. He was not an addict selling drugs to feed his own habit; he never
 8 used any of the substances he distributed. Nor did he have a traumatic childhood that might
 9 explain why he ventured off the right path and into the dangerous world of drug trafficking.
 10 He simply preyed on the addiction of others to make his life better, knowing he was ruining
 11 others. There is no question that the public needs to be protected from him. Not only did
 12 he choose to distribute the types of drugs that kill people, but he also possessed firearms
 13 and was in the process of helping MALDONADO-RAMIREZ acquire an arsenal of
 14 firearms with the intention of shipping them to Mexico where they would have been used
 15 to kill people. He made these decisions with only his own self-interest in mind. If it was
 16 good for him, he did it, regardless of the harm that would ultimately befall others.

17 **E. Kinds of Sentences Available, and Any Necessary Educational or Vocational**
 18 **Training or Other Special Care**

19 Mario AMADOR-GARCIA does not appear to have any medical issues that the
 20 Bureau of Prisons cannot adequately address. PSR ¶¶ 58, 60-61. Furthermore, it does not
 21 appear that he will need any substance abuse treatment, as he reports no prior use or abuse
 22 of any drugs and stated that he could go weeks without consuming any alcohol. PSR ¶ 66.

23 **F. Need to Avoid Unwarranted Sentence Disparity**

24 Several members of this conspiracy have already been sentenced. *See Exhibit D*
 25 (Sentencing Chart). A sentence of 72 months for Mario AMADOR-GARCIA is not only
 26 appropriate considering the facts and analysis above, but also commensurate with the
 27

1 sentences already handed down to his coconspirators in this case, particularly GARCIA-
2 PEREZ, who received a 72-month sentence.

3 **VI. CONCLUSION**

4 For the reasons set forth above, the United States recommends that this Court
5 sentence MARIO AMADOR-GARCIA to 72 months of imprisonment, followed by four
6 years of supervised release.

7 DATED this 16th day of January, 2024.

8
9 Respectfully submitted,

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